

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

IpLEARN, LLC,

Plaintiff,

v.

BEELINE.COM, INC., *et al.*,

Defendants.

Civil Action No. 11-825-RGA

**STIPULATION AND ORDER OF DISMISSAL WITH PREJUDICE
AS TO DEFENDANT HALOGEN SOFTWARE, INC..**

IT IS HEREBY STIPULATED AND AGREED, by and between Plaintiff IpLearn, LLC (“IpLearn”) and Defendant, Halogen Software, Inc. (“Halogen”), pursuant to Fed. R. Civ. P. 41(a)(2) and (c) and subject to the approval of the Court, that all claims and counterclaims between IpLearn and Halogen in this action are hereby dismissed WITH PREJUDICE, with each party to bear its own costs, expenses and attorneys’ fees.

DATED: September 4, 2012

CONNOLLY GALLAGHER LLP

/s/ Arthur G. Connolly, III

Arthur G. (Chip) Connolly, III (#2667)
1000 North West Street, Suite 1400
Wilmington, Delaware 19801
Telephone: (302) 888-6318
aconnolly@connollygallagher.com
Attorneys for Plaintiff, IpLearn LLC

YOUNG CONAWAY STARGATT & TAYLOR LLP

/s/ Karen L. Pascale

Karen L. Pascale (#2903)
James L. Higgins (#5021)
Rodney Square
1000 North King Street
Wilmington, DE 19801
Telephone: (302) 571-6600
kpascale@ycst.com
jhiggins@ycst.com
Attorneys for Defendant Halogen Software Inc.

IT IS SO ORDERED this _____ day of September, 2012.

UNITED STATES DISTRICT JUDGE

CERTIFICATE OF SERVICE

I, Karen L. Pascale, Esquire, hereby certify that on September 4, 2012, I caused to be electronically filed a true and correct copy of the foregoing document with the Clerk of the Court using CM/ECF (which will send notification that such filing is available for viewing and downloading to all registered counsel), and in addition caused true and correct copies of the foregoing document to be served upon the following counsel of record in the manner indicated::

By E-Mail

Arthur G. Connolly, III [aconnolly@connollygallagher.com]
CONNOLLY GALLAGHER LLP
1000 North West Street, Suite 1400
Wilmington, DE 19801

Plaintiff, IpLearn, LLC

Marc A. Fenster [mfenster@raklaw.com]
Benjamin T. Wang [bwang@raklaw.com]
Fredricka Ung [fung@raklaw.com]
RUSS AUGUST & KABAT
12424 Wilshire Blvd., Suite 1200
Los Angeles, CA 90025

Plaintiff, IpLearn, LLC

William J. Wade [wade@rlf.com]
Anne Shea Gaza [gaza@rlf.com]
RICHARDS, LAYTON & FINGER, PA
One Rodney Square
920 N. King Street
Wilmington, DE 19801

Defendant Beeline.com. Inc.

Daniel M. Silver [dsilver@mccarter.com]
MCCARTER & ENGLISH, LLP
Renaissance Centre
405 N. King Street, 8th Floor
Wilmington, DE 19801

Defendant Connections Education LLC

Philip A. Rovner [provner@potteranderson.com]
POTTER ANDERSON & CORROON, LLP
1313 N. Market St., Hercules Plaza, 6th Flr.
P.O. Box 951
Wilmington, DE 19899-0951

Defendant Element K Corporation
Defendant The Ultimate Software Group Inc.
Defendant Cengage Learning Inc.

Rodger D .Smith, II [rsmith@mnat.com]
MORRIS, NICHOLS, ARSHT & TUNNEL LLP
1201 N. Market Street
Wilmington, DE 19801

Defendant Kenexa Corporation

Alisa E. Moen [moen@blankrome.com]
BLANK ROME LLP
1201 North Market Street
Suite 800
Wilmington, DE 19801-4226

Defendant Lawson Software Inc.

Mary B. Graham [mgraham@mnat.com]
Jeremy A. Tigan [jtigan@mnat.com]
MORRIS, NICHOLS, ARSHT & TUNNEL LLP
1201 N. Market Street
Wilmington, DE 19801

Defendant Oracle Corporation

John W. Shaw [jshaw@shawkeller.com]
Andrew Russell [arussell@shawkeller.com]
SHAW KELLER LLP
300 Delaware Avenue, Suite 1120
Wilmington, DE 19801

Defendant NCS Pearson Inc.

Stamatios Stamoulis [stamoulis@swdelaw.com]
Richard C. Weinblatt [weinblatt@swdelaw.com]
STAMOULIS & WEINBLATT LLC
Two Fox Point Centre
6 Deny Road, Suite 307
Wilmington, DE 19809

Defendants Lumesse AS and Lumesse, Inc.

George H. Seitz , III [gseitz@svglaw.com]
SEITZ, VAN OGTRUP & GREEN, P.A.
222 Delaware Avenue, Suite 1500
P.O. Box 68
Wilmington, DE 19899

Defendant Operitel Corporation

YOUNG CONAWAY STARGATT & TAYLOR, LLP

/s/ Karen L. Pascale

September 4, 2012

Karen L. Pascale (No. 2903) [kpascale@ycst.com]
Rodney Square
1000 North King Street
Wilmington, Delaware 19801
Telephone: 302-571-6600
Attorneys for Defendant Halogen Software, Inc.